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VIA HAND-DELIVERY

The Honorable Vaughn R. Walker
U.S. District Court
Northern District of California
450 Golden Gate Avenue
San Francisco, California 94102

Re: *In re: National Security Agency Telecommunications Records Litigation*, MDL Docket No. 06-1791 VRW; *Riordan v. Verizon Communications, Inc. et al.*, Case No. 06-3574 VRW

Your Honor:

As counsel for the Plaintiffs in *Riordan v. Verizon Communications, Inc.* (No. 06-3574) and with the consent of the Plaintiffs in *Chulsky v. Cellco Partnership & Verizon Communications Inc.* (Case No. 06-6570), and *Bready v. Verizon Maryland Inc.* (Case No. 06-6313), we write to bring to the Court's attention to a brief filed by these parties today in Opposition to Verizon's Motion to Dismiss these three cases (MDL Docket No.06-1791-VRW). Verizon's Motion (Doc. No. 270) is based primarily on the argument that these Plaintiffs' claims under state law are preempted based on federal interests in national security or by the Supremacy Clause. Thus, Verizon's Motion and these Plaintiffs' Opposition raise many of the same preemption issues coming before the Court in the State Officials Cases, where motions to dismiss and for summary judgment are scheduled for hearing on June 21, 2007.

Verizon's Motion to Dismiss *Riordan, Chulsky* and *Bready* based on preemption is set for hearing with several other motions in the Verizon cases on August 30, 2007. However, because these issues are before the Court in the related States' Officials' cases on June 21, 2007, we have filed this opposition brief early, so that it may be before the Court in advance of the June 21 date. We respectfully request that the Court give such consideration to the arguments in this opposition brief (and, for that matter in Verizon's Motion) as may be warranted for the June 21 hearing.

Respectfully,

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